

IN THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

CRYSTAL SEAMAN,

*

PLAINTIFF,

*

VS.

* CASE NO. 2:05-CV-414-T

FOOD GIANT SUPERMARKETS, INC.,

*

DEFENDANT.

*

PLAINTIFF'S DESIGNATION OF DEPOSITIONS TO BE USED IN RESPONSE

COMES NOW the Plaintiff, Crystal Seaman, by and through her undersigned attorneys, and identifies the portions of those depositions that she intends to use in rebuttal to Defendant's designation of same at the trial of this matter, done as pursuant to the Order of Judge Delores Boyd, United States Magistrate Judge:

1. The Plaintiff intends to use the entire deposition of Dr. Steven Beranek taken via telephone on December 29, 2005, and all attachments thereto.
2. Deposition of Plaintiff
 - a. Page 17, lines 10-23
 - b. Page 18, lines 8-22
 - c. Page 19, lines 10-15
 - d. Page 22, lines 9-21
 - e. Page 25, lines 24-25
 - f. Page 26, lines 1-2
 - g. Page 30, line 23
 - h. Page 31, lines 6-10 & 16-18
 - i. Page 33, lines 2-14
 - j. Page 36, lines 17-20
 - k. Page 37, lines 17-20
 - l. Page 40, lines 22-25
 - m. Page 41, lines 13-19
 - n. Page 43, lines 4-9
 - o. Page 68, lines 6-18
 - p. Page 75, line 25
 - q. Page 76, lines 1-8 & 19-24
 - r. Page 78, lines 23-25
 - s. Page 79, lines 1-14

3. Deposition of Plaintiff's Husband
 - a. Page 27, lines 14-19
 - b. Page 12, lines 16-19
 - c. Page 13, lines 4-18
 - d. Page 14, lines 20-25
 - e. Page 15, lines 1-19
 - f. Page 17, lines 1-25
 - g. Page 18, lines 1-25

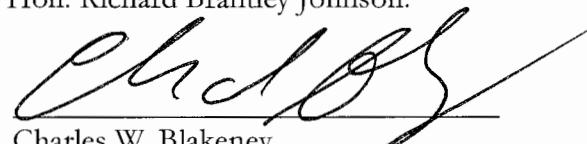
Respectfully submitted this 8 day of June, 2006.



Charles W. Blakeney, BLA068
Attorney for Plaintiff
Post Office Box 100
Geneva, Alabama 36340
334-684-2387

CERTIFICATE OF SERVICE

I hereby certify that on the 8 day of June, 2006, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to Hon. M. Warren Butler, Hon. David J. Harrison, and Hon. Richard Brantley Johnson.



Charles W. Blakeney